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**State of North Carolina
Utilities Commission**

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August 9, 2001

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
Portals
445 Twelfth Street, S.W.
Washington, DC 20554

**Re: North Carolina Utilities Commission's Petition for Additional Delegated
Authority to Implement Number Optimization Measures, NSD File
No. L 99-97, CC Docket No. 96-98**

Dear Ms. Salas:

By way of this letter, the North Carolina Utilities Commission (NCUC) is responding to a verbal request from Ms. Jennifer Gorny, FCC Staff, on August 7, 2001, for a current statement of position concerning its outstanding petition for delegated authority for thousands-block pooling in the 336 NPA. The NCUC strongly believes that its outstanding petition for delegated authority should be granted.

According to the most current available exhaust projection information prepared by the North American Numbering Plan Administrator, the 336 NPA is scheduled to exhaust in the first quarter of 2003. The 336 NPA is not yet "in jeopardy" according to the industry definition. As we understand the NRO and the existing exhaust information, the NCUC will be unable to avoid granting the pending petition for relief in the 336 NPA unless pooling is implemented before the end of the fourth quarter of 2001.

As background, the 336 NPA includes Winston-Salem and Greensboro, North Carolina, and the surrounding area, and, therefore, includes a top 100 MSA. The Greensboro MSA is commonly referred to as the "Triad Area" in North Carolina. The five principal counties making up the Triad--Alamance, Guilford, Caswell, Forsyth and Randolph--have experienced a combined 5% increase in population for the twelve month

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period from July, 1998, thru July, 1999. The area covered by the 336 NPA has been the subject of two prior area code changes, the first of which occurred in 1993, when the 910 NPA was created from the existing 919 NPA, and the second of which occurred in 1997 when the 910 NPA was divided into the existing 910 and 336 NPAs. As a result, the residents of the 336 NPA are facing their third area code relief order in the past decade, which is a result that we would very much like to avoid if humanly possible.

The NCUC has already received delegated authority to implement pooling trials in the 704/980 and 919/984 NPAs. The process of implementing these pooling trials has gone smoothly to date. The experience gained during the implementation of the pooling trial in the 704/980 NPA significantly eased the implementation of pooling in the 919/984 NPA. Based on that experience, we believe that the implementation of pooling in the 336 NPA would be even more uneventful. The NCUC is prepared to move expeditiously toward the implementation of thousands-block pooling in the 336 NPA as soon as we receive delegated authority to do so. For all of these reasons, the NCUC believes that thousands-block pooling can be implemented prior to the first quarter of 2002 in the event that the Commission acts on our pending petition for delegated authority promptly.

Based on our own experience and that of other state commissions, the NCUC anticipates that pooling will materially extend the life of the 336 NPA. A failure to grant delegated authority in the near future will inevitably result in the entry of a relief order for that NPA. Delaying the implementation of pooling in the 336 NPA until the early stages of the national rollout means that the pooling process will not start until the second quarter of 2002, which means, in turn, that the NCUC will be required to order relief for the 336 NPA as a precondition for beginning the pooling process. As a result, delaying the implementation of pooling in the 336 NPA until the early stages of the national rollout will deprive the NCUC of any ability to forestall an award of relief, resulting in the unnecessary loss of scarce numbering resources and unnecessary expense for the industry and consumers. Therefore, the NCUC persists in seeking delegated authority for the 336 NPA.

If you need any additional information concerning our request for delegated authority for the 336 NPA, please contact Switzon Wigfall at 919 733-2924. I am enclosing for filing an original and five copies of this letter. If you would kindly file-stamp one copy of this letter and return it to me in the enclosed envelope for our internal records, it would be most appreciated. Thank you very much for your assistance.

Very truly yours,



Jo Anne Sanford, Chair

JAS/SSW/dph